UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 1:19-cv-04074-VEC

CHRISTINE GRABLIS, individually; and on behalf of All Others Similarly Situated;

Plaintiff,

 $\mathbf{v}.$

ONECOIN LTD., a foreign corporation; RUJA IGNATOVA, an individual; KONSTANTIN IGNATOV, an individual; SEBASTIAN GREENWOOD, an individual; and MARK SCOTT, an individual;

Defendants.

AFFIDAVIT OF DAVID C. SILVER

BEFORE ME, the undersigned authority, personally appeared DAVID C. SILVER, who, after being first duly sworn, deposes and says:

- 1. My name is DAVID C. SILVER, and I am over eighteen (18) years of age.
- 2. I make this affidavit based on my own personal knowledge; and, if called upon, I could and would competently testify thereto.
- 3. I am an attorney with the law firm Silver Miller, counsel for Plaintiff Christine Grablis ("Ms. Grablis") and Movant Donald Berdeaux ("Mr. Berdeaux"), who have jointly moved the Court in the above-captioned action to serve as the Lead Plaintiffs in this putative class action lawsuit.
- 4. In support of Ms. Grablis and Mr. Berdeaux's Motion for Appointment as Lead Plaintiffs, Mr. Berdeaux executed and submitted to the Court under penalty of perjury a "Certification of Representative Plaintiff pursuant to Federal Securities Laws," setting forth his investments in the OneCoin Ltd. securities that are the subject of this action during the Class Period set forth in the Complaint.
- 5. Pursuant to the Court's request on July 9, 2019 for specification and explanation of the financial losses Mr. Berdeaux purports to have suffered as a result of Defendants' alleged

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Affidavit of David C. Silver Civil Action No. 1:19-cv-04074-VEC

misconduct, I called and spoke with Mr. Berdeaux; he confirmed the representations set forth in his Certification; and he explained that he — in a very similar fashion to Ms. Grablis — suffered an approximate total loss of the investments he made into the OneCoin Ltd. securities described and delineated in his Certification.

6. Mr. Berdeaux specifically adopts Ms. Grablis' allegations as strikingly similar to his own; and as a result of Defendants' misconduct as alleged in the Complaint in this action, Mr. Berdeaux alleges and presently calculates his economic losses to be in the approximate sum of Seven Hundred Fifty-Five Thousand Nine Hundred Eighteen Dollars and Ninety-Two Cents (\$755,918.92).

FURTHER AFFIANT SAYETH NAUGHT.

DAVID C. SILVER

STATE OF FLORIDA) ss: COUNTY OF BROWARD)

SWORN TO AND SUBSCRIBED before me this <u>10th</u> day of <u>July</u> 2019.

(Signature of Notary)

(Type, print, or stamp name of

Personally Known

or

Produced Identification []

Type of Identification Produced: _